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USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 6/13/2025
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June 12, 2025

VIA ECF

MEMORANDUM ENDORSED

Hon. Gregory H. Woods
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *Sandra S.T. v. Empire Healthchoice Assurance, Inc. et al.*
Civil Action No. 1:25-cv-02528-GHW
Consent Letter Request for Extension of Deadline for Empire Defendants to
Respond to Complaint and for Adjournment of Pretrial Conference

Your Honor:

This firm represents Defendants Empire Healthchoice Assurance, Inc. and The Empire Blue Access PPO Prism Plan (collectively "Empire") in the above-referenced action. With Plaintiff's consent, Empire requests a 30-day extension of the deadline to file a response to the Complaint, resulting in a new deadline of **July 21, 2025**. In support of this request and in compliance with Your Honor's Individual Rules of Practice in Civil Cases, Empire states the following:

1. The current deadline for Empire to file a response to the Complaint is June 20, 2025;
2. Empire is requesting this extension because it is in the process of reviewing documents and information in defense of the claims. Defendant Brooklyn Academy of Music, Inc. has not been served and/or appeared, and an extension will allow time for Empire to potentially coordinate a response with all defendants;
3. This is Empire's first request for an extension of this deadline;
4. This request is made with the consent of Plaintiff; and
5. The extension, if granted, will not prejudice any party.

Additionally, Empire respectfully requests a 60-day adjournment of the Initial Pretrial Conference to **August 26, 2025**, with a corresponding adjournment of the deadline for the parties

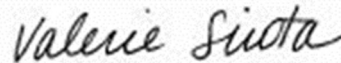
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to file a pre-conference status letter to **August 19, 2025**. In support of this request, Empire states the following:

1. The Initial Pretrial Conference is currently scheduled for June 27, 2025, with a corresponding deadline of June 20, 2025 for the parties to file a pre-conference status letter;
2. Empire is requesting this extension for the same reason as set forth above;
3. This is Empire's first request for an extension of this deadline;
4. This request is made with the consent of Plaintiff; and
5. The extension, if granted, will not prejudice any party.

We thank Your Honor for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Valerie Sirota".

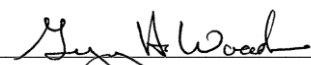
Valerie Sirota

cc: All Counsel of Record (via ECF)

Application granted. The deadline for Defendants to answer or otherwise respond to the complaint is extended to July 21, 2025. The initial pretrial conference scheduled for June 27, 2025 is adjourned to August 26, 2025 at 4:00 p.m. The deadline for the parties to file the joint letter and proposed case management plan outlined in the Court's March 31, 2025 order, Dkt. No. 6, is extended to August 19, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 14.

SO ORDERED.

Dated: June 13, 2025
New York, New York



GREGORY H. WOODS
United States District Judge